



April 10, 2017

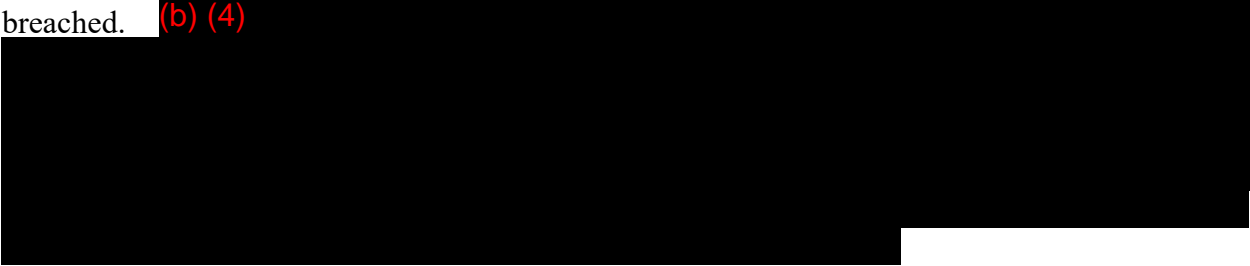
Via Email

Darryl Nelson, Contracting Officer (Darryl.nelson@navy.mil)
Elaine Florence, Contracting Specialist (Elaine.florence@navy.mil)
NAVSUP FLC Jacksonville
110 Yorktown Ave., Bldg. 100, 3rd Floor
Jacksonville, FL 32213-0097

**Re: Contract Claim of Munilla Construction Management, LLC
Seaward Services, Inc. Contract No. N68836-17-C-0001
Port Operations at Guantanamo Bay Naval Station, Guantanamo Bay, Cuba**

Dear Mr. Nelson and Ms. Florence:

Munilla Construction Management, LLC ("MCM") hereby submits this claim under the above-captioned contract. Although the contract was awarded to Seaward Services, Inc. ("Seaward"), MCM is an intended third-party beneficiary under this contract with rights that have been breached. (b) (4)



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Elaine Florence, Contracting Specialist
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Elaine Florence, Contracting Specialist
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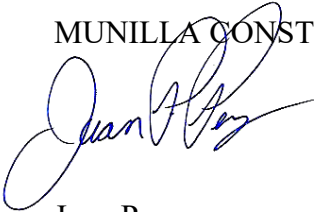


After you have had a chance to review this claim, please call me so that we may discuss it further. Seaward promised in its proposal that it would provide a work force and start performance on February 1, 2017. Seaward's proposal should never have been evaluated and allowed to drive up MCM's labor costs by violating the clear contract requirement prohibiting the recruitment of on-base employees by offering higher wages and other amenities.

Darryl Nelson, Contracting Officer
Elaine Florence, Contracting Specialist
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Sincerely,

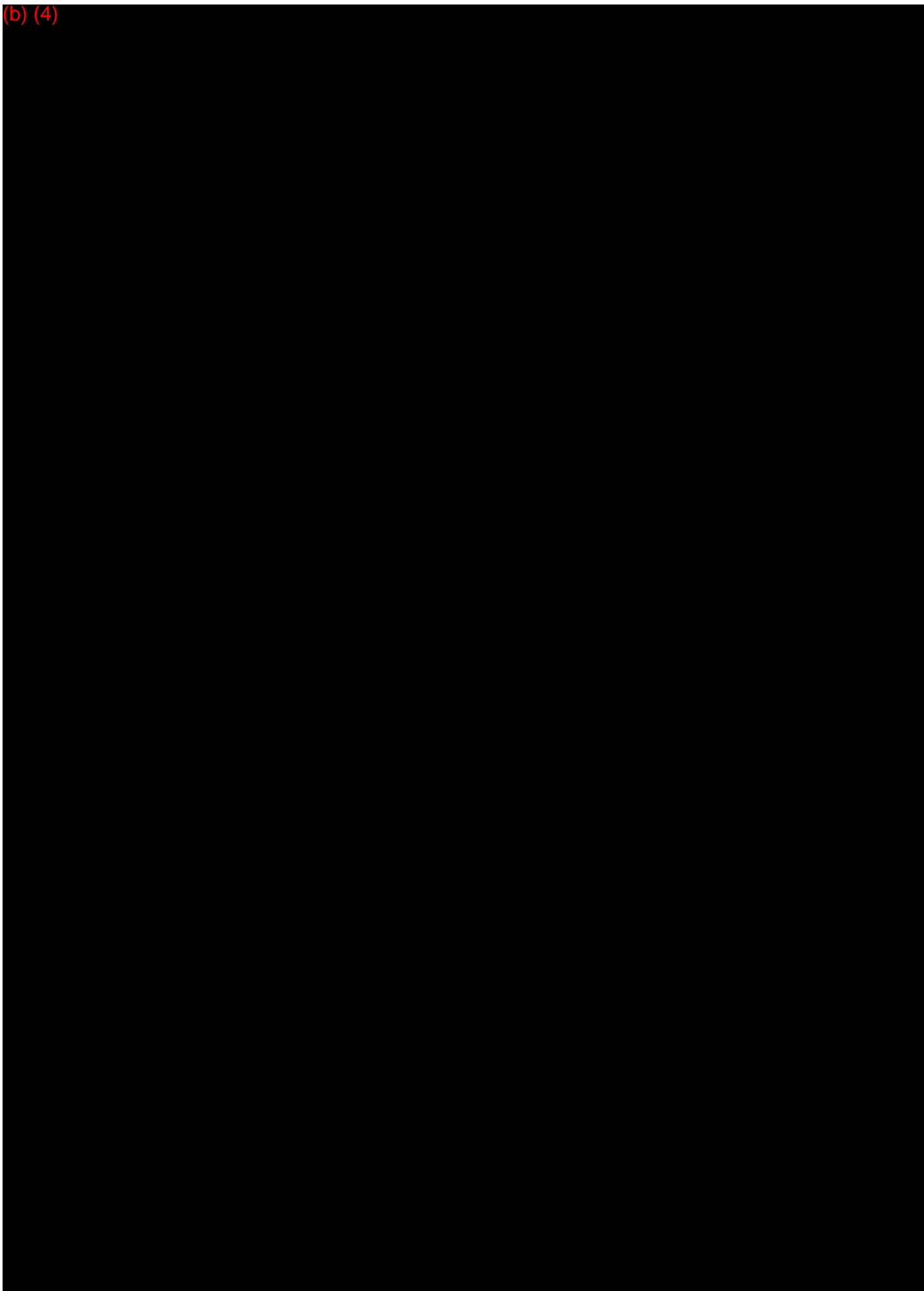
MUNILLA CONSTRUCTION MANAGEMENT, LLC

A handwritten signature in blue ink, appearing to read "Juan Perez", with a stylized flourish at the end.

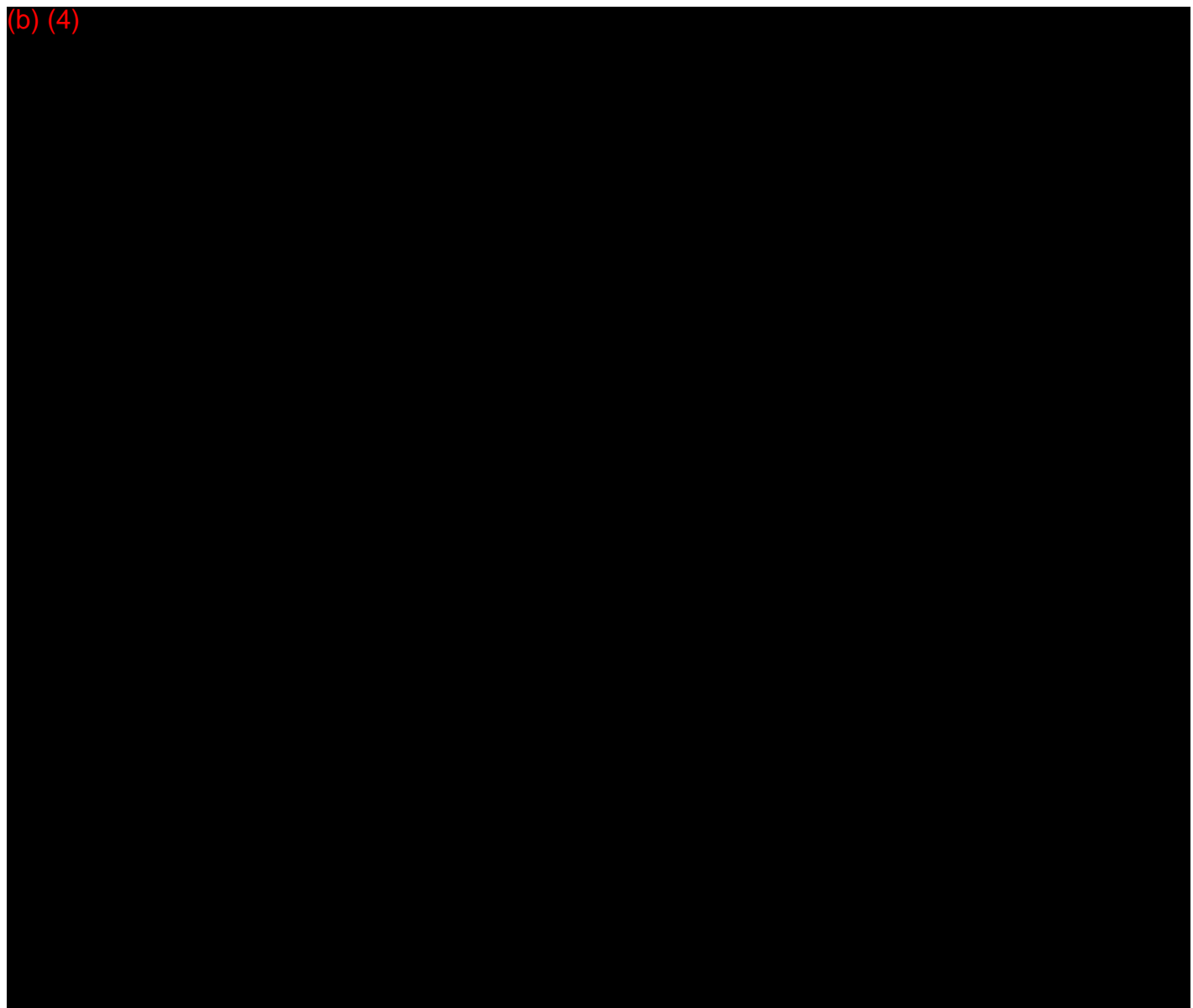
Juan Perez
Director of GTMO Operations

Enclosures

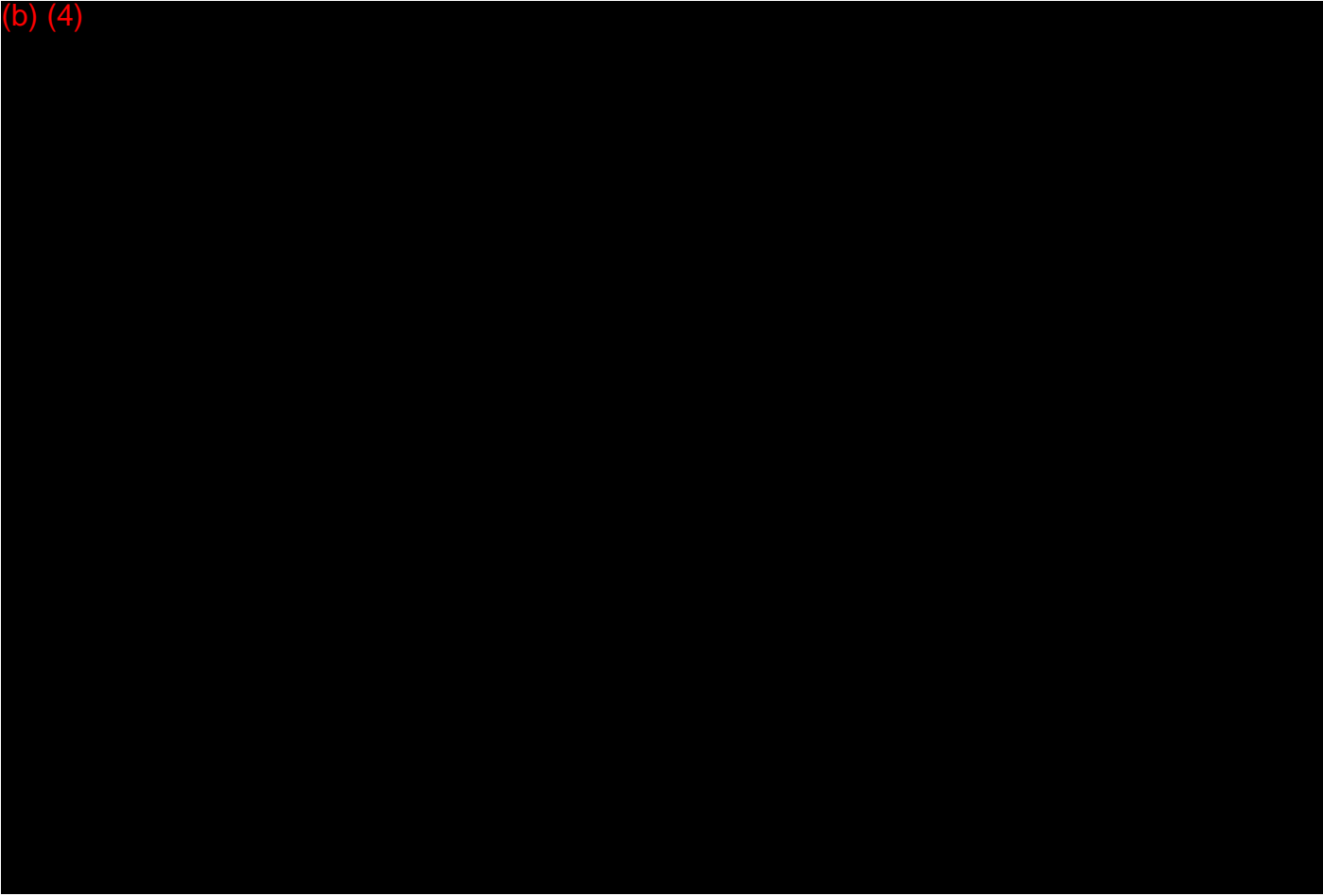
cc: Karl Dix, Jr., Esq.
Mr. Juan Perez
Capt. Martin Bryant
Mr. Elliot Press
Daniel Munilla, Esq. MCM General Counsel
Pedro Munilla, Esq.
Mr. Juan Munilla



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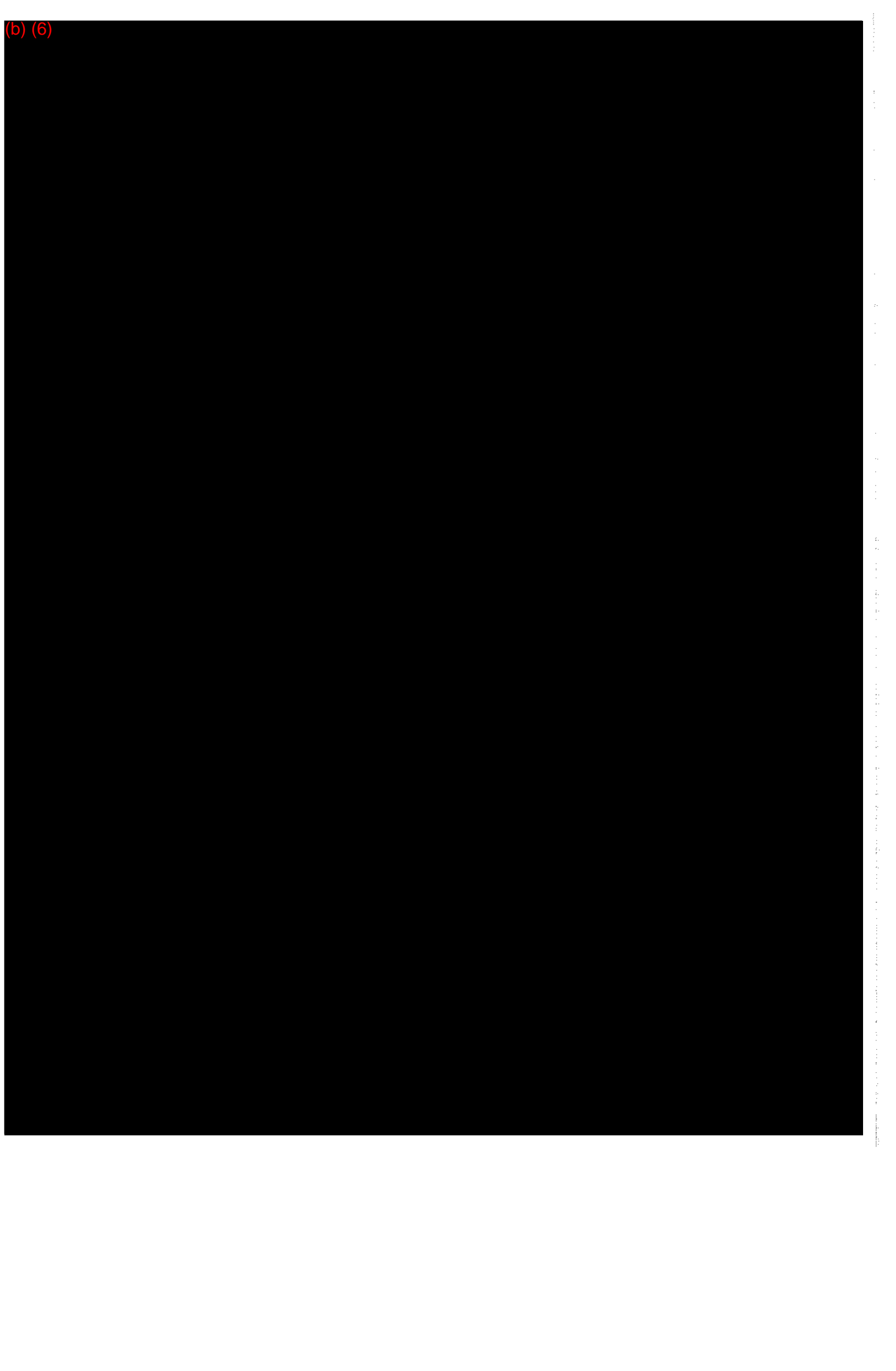
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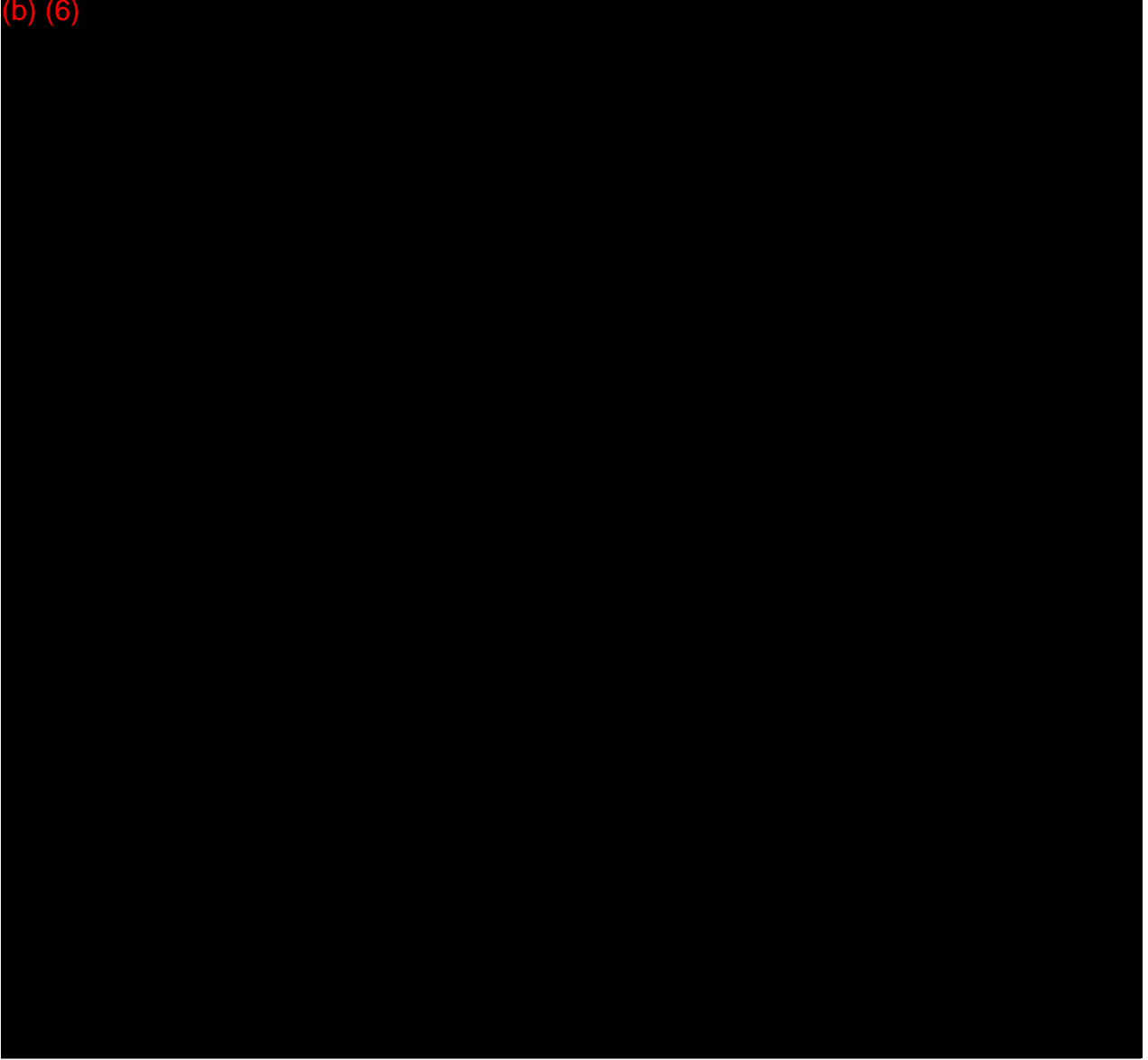
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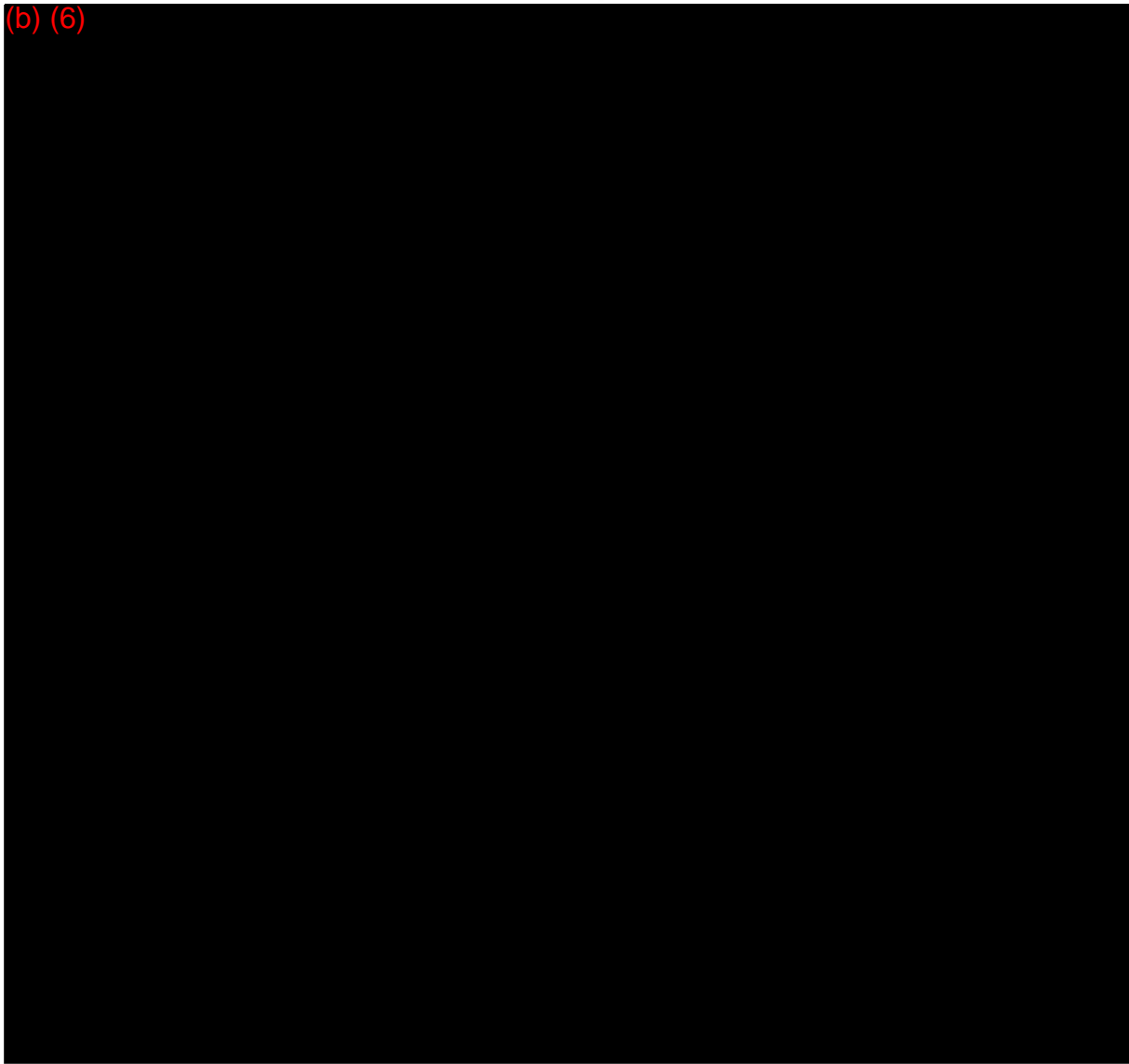
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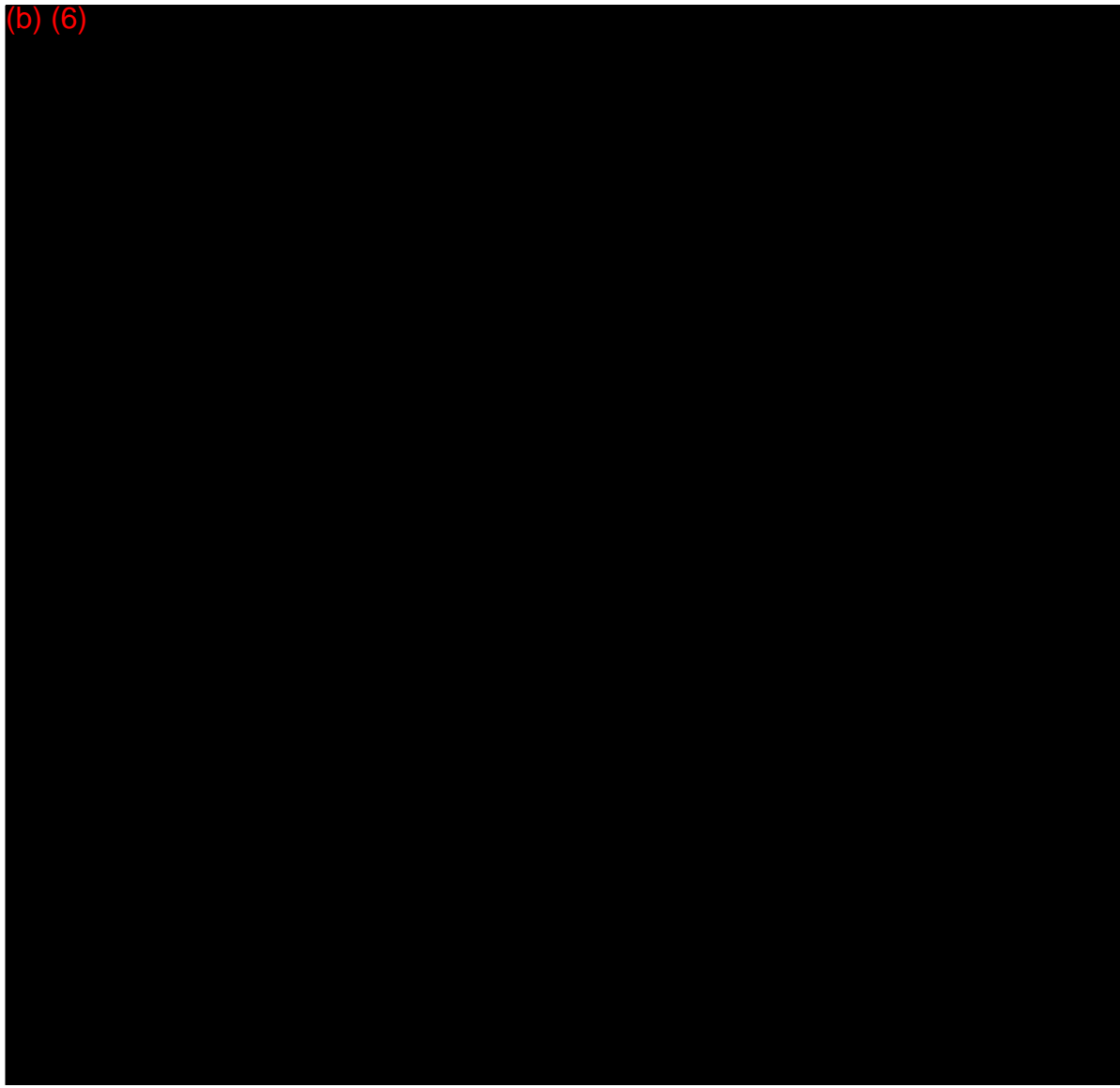
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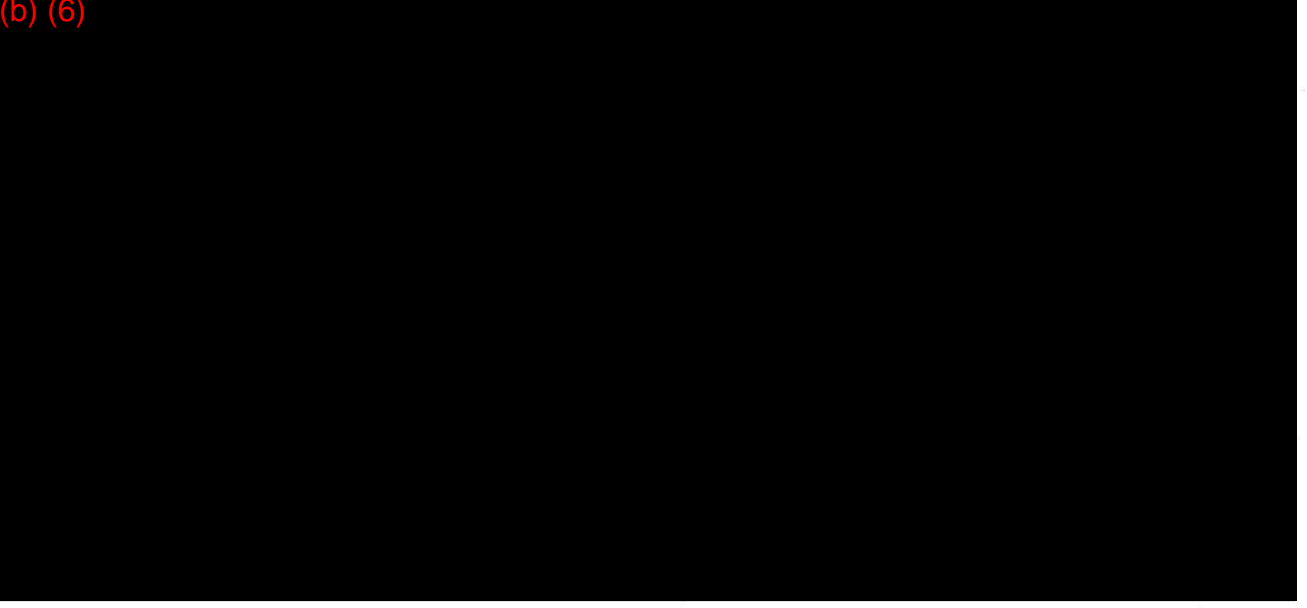
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